

ANTHONY B. CORLETO  
PARTNER  
[TCORLETO@GRSM.COM](mailto:TCORLETO@GRSM.COM)

**GORDON & REES**  
**SCULLY MANSUKHANI**  
**YOUR 50 STATE PARTNER™**

ATTORNEYS AT LAW  
500 MAMARONECK AVENUE, SUITE 503  
HARRISON, NY 10528  
T: 914-777-2225  
F: 914-7090-4566  
[WWW.GRSM.COM](http://WWW.GRSM.COM)

May 24, 2021

Judge Michael P. Shea  
United States District Court, District of Connecticut  
450 Main Street- Room 217  
Hartford, CT 06103

**Re: CLJ, et. al. v. HUD, et. al.**  
**Index No.: 3:20-cv-01728-MPS**

Dear Judge Shea:

Our firm represents The Housing Authority of the City of Hartford ("HACH"). We write in accordance with your instructions for discovery disputes, following a call with Ms. Constantine this past Wednesday, May 19.

As background, the individual plaintiffs resided at three privately owned Section 8 properties in the City of Hartford, each of which had a history of deteriorating condition. None were owned, maintained or managed by HACH. HUD appointed HACH as Section 8 Voucher administrator to support the relocation of tenants to other eligible properties. Plaintiffs claim they are entitled to enhanced relocation services – so they can relocate to "economically advantaged" areas outside the City of Hartford.

Plaintiffs First Request for Production, item 1(e), seeks "all documents maintained on each relocation class plaintiff as may be required under 24 CFR §982.158". The documents maintained by HACH in its role as Section 8 Voucher Administrator contain Personal Identifying Information ("PII") such as names, date of birth, ethnicity, criminal records, social security numbers ("SSN") and documentation, such as birth certificates, driver's licenses and social security cards, and are generally considered confidential as between the Tenant and the Section 8 Voucher Administrator. HACH generally objects to producing material that contains confidential and sensitive information without express authorization from the individuals whose PII and confidential information is sought.

In recent discussion, plaintiff's counsel expressed an expectation that "Relocation Files" would be produced in response to RFP 1(e).

HACH has offered to produce Relocation files for any of the named plaintiffs who provide an executed authorization allowing HACH to do so. As the class has not been certified, it is not clear that counsel has authority to make this request for any individuals other than the named plaintiffs.

HACH has also offered to produce, through electronic discovery, essentially "all documents maintained on each relocation class plaintiff as may be required under 24 CFR §982.158". This material will be produced in redacted form, so as to avoid disclosure of PII and information that is considered confidential as between the tenant and the Section 8 Voucher Administrator.

Before suit was commenced, the plaintiff organization issued a Freedom of Information Act request seeking CARA and Infill resident information including "race/ethnicity information, census tracts, number of dependents, household size and income for each resident". HACH responded to that request, assembling and producing a volume of de-identified data. HACH has also offered to produce that material to plaintiff's counsel.

We are available for a phone conference if Your Honor has further questions regarding this matter.

Best regards,

GORDON REES SCULLY MANSUKHANI, LLP

A handwritten signature in dark ink, appearing to read 'AC', with a long horizontal line extending to the right.

Anthony B. Corleto

Cc: James Yoon  
Alexander Setzepfandt  
COVINGTON & BURLING LLP  
Counsel for Plaintiffs  
One CityCenter, 850 Tenth Street, NW  
Washington, DC 20001  
jyoon@cov.com  
asetzepfandt@cov.com

CENTER FOR LEADERSHIP AND  
JUSTICE, ET AL.

Plaintiffs,

V.

UNITED STATES DEPARTMENT OF  
HOUSING AND URBAN  
DEVELOPMENT, ET AL.

Defendants.

CIVIL ACTION NO. 20-CV-01728-MPS

May 24, 2021

Pursuant to Fed.R.Civ.Pro. 37 (a)(1) and Local Rule 37 (a), the defendant HOUSING AUTHORITY OF THE CITY OF HARTFORD, certifies that Defendant has complied with their good faith conference obligations under the Federal Rules and Local Rules.

A letter outlining the discovery dispute is submitted herewith.

RESPECTFULLY SUBMITTED,

By: /s/ Anthony B. Corleto  
Anthony B. Corleto (ct13520)  
Gordon Rees Scully Mansukhani, LLP  
500 Mamaroneck Ave, Suite 503  
Harrison, NY 10528  
Telephone No.: (914) 777-2228  
[tcorleto@grsm.com](mailto:tcorleto@grsm.com)  
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